

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

:

INFORMATION

-v.-

:

S1 07 Cr. 461 (HB)

KI YUNG YEUNG,

:

Defendant.

:

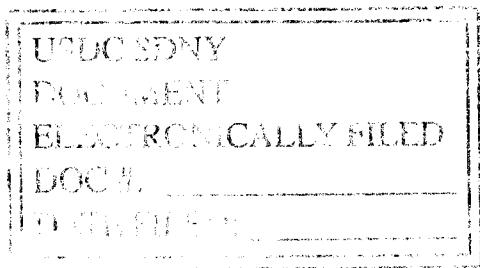
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COUNT ONE

The United States Attorney charges:

1. In or about November 1998, in the Southern District of New York and elsewhere, KI YUNG YEUNG, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, to wit, HSBC Bank, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, YEUNG fraudulently obtained a \$100,000 line of credit from HSBC Bank by falsely representing facts about her employment status and authority to act on her husband's behalf.

(Title 18, United States Code, Section 1344.)



COUNT TWO

The United States Attorney further charges:

2. From in or about 1989 through in or about 2003, in the Southern District of New York and elsewhere, KI YUNG YEUNG, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 1344 of Title 18, United States Code.

3. It was a part and object of the conspiracy that KI YUNG YEUNG, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations and promises, in violation of Title 18, United States Code, Section 1344.

Overt Act

4. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and

elsewhere:

a. In or about November 1998, KI YUNG YEUNG, the defendant, applied in Manhattan, New York, for a \$100,000 line of credit from HSBC Bank in Manhattan by misrepresenting facts about her employment status and authority to act on her husband's behalf.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

5. As a result of committing the offenses alleged in Counts One and Two of this Information, KI YUNG YEUNG, the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the offenses.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which

cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461).


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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- v. -

KI YUNG YEUNG,

Defendant.

INFORMATION

07 Cr.

(18 U.S.C. § 1344, 1349)

MICHAEL J. GARCIA
United States Attorney.

7/26/07 File Tkt + Power of Att'd
of Russ Dow Civil vs Dkt
Ki Yung Yeung pro se w/ attorney
Jane Ann Flynn Smith Recd!
by Atty Ad. Recd from Cuff
to Cr #1 & 2 of Tkt Sentenc'd.

Atty Tkt + Power of Att'd